**Supplemental Comments of Qwest Corporation in
Docket No. UT-010558
Cessation of Certain Telecommunications Services**

On July 13, 2001, Qwest Corporation ("Qwest") submitted written comments pursuant to the Commission's June 7, 2001 Notice of Opportunity to File Written Comments in the above referenced docket. Qwest's initial comments encouraged the Commission to retain the existing rule without further revision. At the June 28, 2001 workshop Qwest reviewed the issues it has faced when customers change carriers and have a difficult time reestablishing service. The issues most frequently experienced include number portability issues and continuance of service provisioned by more than one telecommunications provider. On July 18, 2001, the Commission staff requested further comment on these issues. Following are supplemental comments that address these concerns.

Introduction

Qwest proposes three additional requirements for inclusion in WAC 480-120-083. The first requirement addresses the need for notice to suppliers when telecommunications carriers who cease business in state of Washington utilize the services of such suppliers to furnish service to their customers. The second requirement addresses the need for notice to suppliers when telecommunications carriers who cease business in state of Washington utilize resold services of such suppliers. The third requirement addresses the issue of assigned and unassigned telephone numbers. These rule requirement additions will enable customers of the carrier ceasing business to arrange for new service with any telecommunications provider in a more efficient manner.

Notice to Suppliers of Unbundled Network Elements

Qwest proposes an additional notice requirement when telecommunications companies plan to cease providing service. A notice to the provider's suppliers would be required when the supplier provides the carrier ceasing service with unbundled networks elements and such elements are part of a furnished service provided to some or all of the telecommunications company's customers. It is most appropriate for the ceasing carrier to notify the supplier of unbundled network elements that such elements will be available at a date certain for assignment to other providers or directly by wholesale provider to a retail customer.

For example, when Qwest provides an unbundled loop to another telecommunications provider, it does not necessarily know whom that loop is assigned to by the provider. Qwest assigns a line identification number to each unbundled loop; the number is not the telephone number. Qwest may not know the telephone number assigned to the loop since the provider of the retail service may have assigned it. Qwest may also not provide dial tone services to the customer.

Under the proposed rule language attached, the carrier ceasing business will need to notify its supplier of plans to disconnect the unbundled loop service before such a supplier can utilize the loop for another carrier or directly for the customer. Absent such notification or disconnect order, the supplier or any other carrier may have to build new facilities to the customer's address before service can be provisioned. This lack of notice or disconnect order may create unnecessary delays for the retail customer since the supplier's records may indicate the unavailability of a loop at the customer's premises until the provider ceasing business returns the unbundled loop to the supplier's inventory or provides notice of the intent to do so by a date certain. Notice to any supplier should be provided at least thirty days before the company ceases to provide service along with any relevant information, such as the assigned telephone number, that would be useful to the superseding provider.

Another example of the need for such notice arises when multiple providers provision a private line service that includes interoffice facilities. For example, one portion of the circuit may be provisioned over the carrier's own facilities that is ceasing business and another portion of the circuit, the interoffice facility, is provisioned as an unbundled network element or through facilities sold to the provider by another carrier. For any superseding provider to continue service to the private line customer, they may need to know which portion of the circuit is available from another supplier and which portion needs to be built or replaced. This type of scenario would require the ceasing carrier to provide the customer, or another supplier who plans to serve the customer with the supplier's circuit identification number in order to arrange for continued service. The supplier has no knowledge of how its portion is utilized in the provision of service to the private line customer. Therefore the supplier would be unable to directly or indirectly continue service to the customer absent further information.

Telecommunications companies ceasing business should work with their suppliers and other providers of service to minimize service disruption or loss of service to their customers. The supplier of unbundled network services will better be able to provision service to another carrier selected by the customer or directly to the customer if the carrier ceasing business provides circuit or loop identification information to enable continuance of service.

Notice to Suppliers of Resold Service

Another rule requirement is proposed when the provider ceasing service is reselling service provided by another company. The provider must work with the provider of the resold service and possibly the customer's superseding carrier to arrange for a transfer of service. The customer can call and order service from another provider but the supplier of the resold service must be informed that the customer no longer wants service from the provider ceasing service in order to allow for the same service to be available for resale by another provider or directly to the customer. If the provider ceasing service does not notify the supplier of the resold service, the supplier's records may indicate additional service is not available at the customer's premise.

This lack of notice may create unnecessary delays for the retail customer since the supplier's records may indicate the unavailability of resold service at the customer's premises until the provider ceasing business returns the resold service to the supplier's inventory or provides notice of the intent to do so by a date certain. Notice to any supplier should be provided at least thirty days before the company ceases to provide service along with any relevant information that would be useful to the superseding provider.

Notice to the National Number Administrator

The attached proposed rule revisions include a requirement that the telecommunications company ceasing business notify the national number administrator and release all unassigned telephone numbers to the number administrator. The company also should be required to release all assigned telephone numbers to other companies ultimately selected by the customer as the superseding provider of service. Rule provisions that address number portability issues for assigned telephone numbers should facilitate continuance of customer service under their existing telephone number in a more efficient manner.

Summary

These rule requirement additions should enable customers of the carrier ceasing business to arrange for new service with any telecommunications provider in a more efficient manner. However, the best solution for minimization of the disruption of service to customers is when telecommunications companies ceasing business work with their suppliers and other providers of service to minimize service disruption or loss of service to their customers sufficiently in advance of service termination. To date, Qwest has found that many carriers have employed such an approach, without a rule in place, and that when such occurs the customers typically do not lose service.